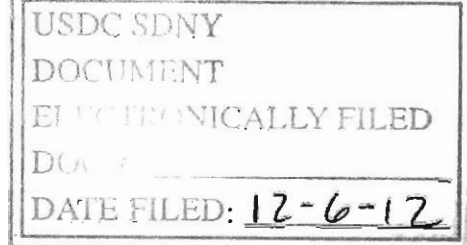


BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
ATTORNEYS AT LAW
NEW YORK • CALIFORNIA • LOUISIANA

William C. Fredericks
wfredericks@blbgllaw.com
212-554-1405

December 5, 2012



By Electronic Mail and Hand Delivery

Hon. Paul A. Crotty
United States District Court Judge
500 Pearl Street, Room 735
New York, NY 10007

Re: *Police & Fire Sys. of the City of Detroit v. SafeNet, Inc.*, No. 06-cv-5797 (PAC)

Dear Judge Crotty:

We represent Lead Plaintiffs in the above-captioned securities class action. By Order and Final Judgment entered December 20, 2010, the Court approved the settlement of the action, which settlement has become final by its terms. The claims administration process has been completed and we are ready to file a motion for approval of a distribution plan for the net proceeds of the settlement to class members who have submitted valid proof of claim forms.

✓ We write to request leave from Your Honor's Individual Practice Rule 3.A, requiring a pre-motion conference. Under the terms of the Stipulation and Agreement of Settlement, specifically Paragraphs 25 and 27, defendants have no role in or responsibility for the administration or processing of Proofs of Claims, including determinations as to the validity of claims or the distribution of the Net Settlement Fund. We have communicated with counsel for defendant SafeNet, Inc. and advised them that we are prepared to file the distribution motion and that we would be seeking leave from the requirement for a pre-motion conference. SafeNet's counsel has advised us that they take no position on the distribution motion and do not oppose the request for relief from Individual Practice Rule 3.A.

We appreciate the Court's consideration of this matter.

Respectfully submitted,

William C. Fredericks

cc: Richard H. Klapper, Esq. (via email)
John A. Freedman, Esq. (via email)
Matthew B. Holmwood, Esq. (via email)
Joseph Collins, Esq. (via email)
Jonathan Gardner, Esq. (via email)

1285 AVENUE OF THE AMERICAS • NEW YORK • NY 10019-6028
TELEPHONE: 212-554-1400 • www.blbgllaw.com • FACSIMILE: 212-554-1444

SO ORDERED: 12-6-12

HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

MEMO ENCLOSED